

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Residence located in Seattle, WA  
more fully described in Attachment A

Case No. MJ22-413

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Residence, more fully described in Attachment A, incorporated herein by reference.

located in the \_\_\_\_\_ Western \_\_\_\_\_ District of \_\_\_\_\_ Washington \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

## Code Section

18 U.S.C. § 1703(a)

18 U.S.C. § 1709

## Offense Description

Delay or Destruction of Mail.

Theft of Mail Matter by Postal Employee.

The application is based on these facts:

- ☒ See Affidavit of Special Agent Alan G. Hancock, continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

*Alan Hancock*

Applicant's signature

Alan G. Hancock, Special Agent OIG

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or  
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 09/01/2022

*Michelle L. Peterson*

Judge's signature

City and state: Seattle, Washington

Michelle L. Peterson, United States Magistrate Judge

Printed name and title

STATE OF WASHINGTON           )  
   )          SS  
COUNTY OF KING               )

I, Alan G. Hancock, a Special Agent with the U.S. Post Service, Office of Inspector General, having been duly sworn, state as follows:

1. I am a Special Agent with the United States Postal Service, Office of Inspector General (“USPS OIG”). I have been a Special Agent with the USPS OIG since May of 2005. Prior to becoming a Special Agent, I was a Postal Inspector for approximately two years and attended the United States Postal Inspection Service Law Enforcement Training Academy. I am currently assigned to the Seattle Field Office, which is part of the Western Pacific Area Division of the Office of Inspector General. I am authorized to enforce the laws of the United States regarding mail and to investigate major crimes committed against the United States Postal Service.

2. Prior to my law enforcement career, I worked at the USPS as a postal employee for 16 years and held the position of letter carrier, supervisor, and postmaster. During my law enforcement career, I also held the position of Subject Matter Expert for mail theft investigations to assist other agents. As a Special Agent, I have conducted approximately 200 mail theft investigations over my 19-year career.

3. I make this affidavit in support of an application for a warrant authorizing the search of a residence described in Attachment A (incorporated herein by reference), for evidence, instrumentalities, and/or fruits of violations of Title 18, United States Code, Section 1703(a) (Delay or Destruction of Mail) and Section 1709 (Theft of Mail Matter

1 by a Postal Employee), as further described in Attachment B (incorporated herein by  
2 reference).

3 4. Because this affidavit is being submitted for the limited purpose of  
4 establishing probable cause to support the application for a search warrant, I have not set  
5 forth each and every fact that I or others have learned during the course of this  
6 investigation.

### 7 SUMMARY OF PROBABLE CAUSE

8 5. This investigation began after the USPS received a complaint on or around  
9 August 26, 2022, from USPS customer J.H. J.H. resides at a residence located at 3935 S.  
10 Americus Street, Seattle, Washington 98118. J.H. reported that William Justin Baird, her  
11 roommate at the residence and a mail carrier, was storing undelivered mail at their  
12 residence. J.H. stated that she lives in a four-bedroom house where the landlord rents out  
13 three of the four bedrooms to three individuals respectively. She said she recently found a  
14 white USPS mail tub, with mail inside, in the unrented room; the mail was still rubber  
15 banded and appeared undelivered.



25 6. J.H. looked through the mail inside the tub and confirmed that the  
26 postmarks on the mail were for July of 2022. Having reviewed photographs of nine  
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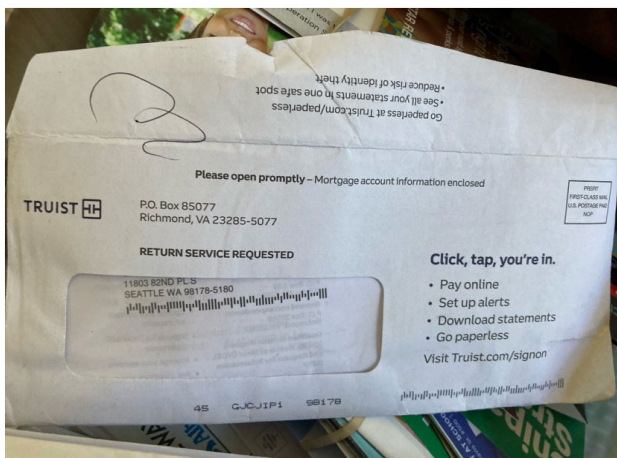
1 pieces of mail from the tub that J.H. sent, I determined that they were all addressed to  
2 postal customers located on city route 10 within zip code 98178.

3 7. J.H. also observed three empty postal tubs inside the room, one of which is  
4 pictured below.



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14 8. J.H. stated that she reviewed the footage from one of the security cameras  
15 outside the residence, and saw Baird return from work one day with a tub of mail.

16 9. J.H. also found open mail in the residence's recycle bin that was not  
17 addressed to Baird, whose recipient address was in the 98178 zip code.



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26 10. I contacted the Postal Manager for the zip code 98178, who confirmed that  
27 Baird worked at the Skyway Post Office in July of 2022 and delivered to zip code 98178.

11. I then searched postal records and determined that the USPS hired Baird on February 12, 2022, as a City Letter Carrier at the Seattle Carrier Annex. The primary duties of a City Letter Carrier include sorting and preparing mail at the post office and delivering and collecting mail along the carrier's assigned route with a postal delivery vehicle. Under USPS rules, postal service employees must preserve and protect the security of all mail in their custody from unauthorized opening, inspection, tampering, delay, reading of the contents or covers, or other unauthorized acts. Letter carriers are prohibited from storing mail at their personal residences.

12. The Seattle Carrier Annex is responsible for delivering mail that is addressed to locations within the ZIP codes 98102, 98104, 98112, 98121, and 98122.

13. Postal records indicate that Baird also delivered mail in city route 10 within zip code 98178, on July 19, 21, 22, 23, 26, 27, 28, 29 of 2022.

### CONCLUSION

14. Based on the facts set forth in this Affidavit, I submit that there is probable cause to believe that a search of the property specified in Attachment A will uncover evidence, instrumentalities, and/or fruits, more fully identified in Attachment B, that pertain to violations of law, specifically, Title 18, United States Code, Section 1703(a) (Delay or Destruction of Mail), and Title 18, United States Code, Section 1709 (Theft of Mail Matter by a Postal Employee).

*Alan Hancock*

ALAN G. HANCOCK, Affiant  
SPECIAL AGENT, USPS OIG

SUBSCRIBED AND SWORN before me this 1<sup>st</sup> day of September, 2022

*[Signature]*

HON. MICHELLE L. PETERSON  
United States Magistrate Judge

**ATTACHMENT B**

**List of Items to be Searched for and Seized**

This warrant authorizes the government to search for and seize the following items:

Evidence, instrumentalities, and/or fruits of the commission of the following crimes: Delay or Destruction of Mail, in violation of Title 18, United States Code, Section 1703(a), and Theft of Mail Matter by a Postal Employee, in violation of Title 18, United States Code, Section 1709, including, but not limited to, the following:

- a. U.S. Mail (opened or unopened) whose recipient address is within the zip code 98178; and
- b. Any property belonging to the USPS, including, but not limited to, mail tubs.

## **ATTACHMENT A**

### **Location to be searched**

The residence, located at 3935 S. Americus St., Seattle, WA 98118, is a two-story house with yellow siding, and white trim. The North side or front of the house has a brown deck with stair access and the numbers 3935 on the house above the deck. The front has no street access but has sidewalk access. The South side or back of the house are the numbers 3935 and has alley access for cars. The main entrance to the residence is a single white door located underneath a covered porch on the West side of the house. Also near the main entrance is a black light pole to illuminate the walkway. The house is surrounded by a chain link fence and near the walk-through gate on the South side is a fence company logo "All City Fence CO." The residence has four bedrooms, three of which are rented to three individuals. The areas to be searched are the spare unrented room and the room at the top of the stairs rented by William Justin Baird









